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6 WELLS FARGO & COMPANY, WACHOVIA MORTGAGE  
7 CORPORATION, WACHOVIA BANK, N.A., WACHOVIA  
8 SECURITIES, LLC, WACHOVIA SECURITIES FINANCIAL  
9 NETWORK, LLC

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JORGE V. RAGDE, JR. AND JENNIFER J.  
RAGDE, On Behalf of Themselves and All  
Others Similarly Situated,

Plaintiff,

v.

WELLS FARGO & COMPANY, WACHOVIA  
MORTGAGE CORPORATION, WACHOVIA  
BANK, N.A., WACHOVIA SECURITIES, LLC,  
WACHOVIA SECURITIES FINANCIAL  
NETWORK, LLC, WACHOVIA  
CORPORATION, and DOES 1-10 Inclusive,

Defendants.

Case No. C 09-0226-SI

**STIPULATION AND  
[PROPOSED] ORDER FOR  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT AND  
VACATING INITIAL CASE  
MANAGEMENT CONFERENCE  
AND RELATED DEADLINES**

WHEREAS, on February 18, 2009, the parties submitted an amended stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to April 2, 2009;

WHEREAS, on March 30, 2009, the parties submitted a second stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to May 4, 2009;

WHEREAS, on April 30, 2009, the parties submitted a third stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to June 8, 2009;

1        WHEREAS, on June 4, 2009, the parties submitted a fourth stipulation to extend the  
2 defendants' time to respond to plaintiffs' initial complaint to July 8, 2009;

3        WHEREAS, the Initial Case Management Conference in this matter is currently scheduled  
4 for Friday, August 7, 2009 at 2:30 p.m.;

5        WHEREAS, the Parties' Rule 26(f) Report and Joint Case Management Statement are  
6 currently due July 31, 2009, 7 days prior to the Initial Case Management Conference;

7        WHEREAS, the Parties are currently required to file ADR Certifications and a Stipulation  
8 to ADR Process or Notice of Need for ADR Phone Conference by Friday, July 17, 2009, 21 days  
9 prior to the Initial Case Management Conference;

10       WHEREAS, the Parties, through their counsel, have reached an agreement in principle to  
11 settle this matter and are in the process of drafting the settlement documentation;

12       IT IS HEREBY STIPULATED AND AGREED pursuant to Local Rule 6-1(a), and  
13 Federal Rule of Civil Procedure 12(a), by and between plaintiffs Jorge V. Ragde, Jr. and Jennifer  
14 J. Ragde and defendants Wells Fargo & Company, Wachovia Mortgage Corporation, Wachovia  
15 Bank, N.A., Wachovia Securities, LLC, Wachovia Securities Financial Network, LLC, Wachovia  
16 Corporation, through their respective attorneys, that the time by which defendants may plead or  
17 otherwise respond to the Complaint shall be extended to and include **Friday, August 7, 2009**.

18       IT IS FURTHER STIPULATED AND AGREED pursuant to Northern District Local  
19 Rules 6-2(a), 7-12, and 16-2(e), that the Initial Case Management Conference currently scheduled  
20 for **Friday, August 7, 2009**, and all other case management deadlines, shall be vacated, pending  
21 final resolution of this matter.

1 Dated: July 6, 2009

2 JEFFREY F. KELLER  
3 DENISE L. DÍAZ  
4 KELLER GROVER LLP.

5 By /s/ Jeffrey F. Keller  
6 Jeffrey F. Keller

7 Attorneys for Individual and Representative  
8 Plaintiff JORGE V. RAGDE, JR. and JENNIFER  
9 J. RAGDE

10 Dated: July 6, 2009

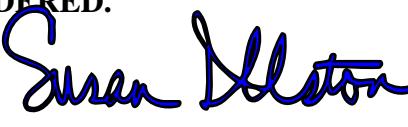
11 JAMES R. McGUIRE  
12 NATALIE NAUGLE  
13 MORRISON & FOERSTER LLP

14 By /s/ James R. McGuire  
15 James R. McGuire

16 Attorneys for Defendant WELLS FARGO &  
17 COMPANY, WACHOVIA MORTGAGE  
18 CORPORATION, WACHOVIA BANK, N.A.,  
19 WACHOVIA SECURITIES, LLC, WACHOVIA  
20 SECURITIES FINANCIAL NETWORK, LLC,  
21 WACHOVIA CORPORATION

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated:

24 By: 

25 Judge Susan Illston

26 The initial case management conference has been continued to Friday,  
27 August 21, 2009, at 2:30 p.m.

## **GENERAL ORDER 45 ATTESTATION**

In accordance with General Order 45, concurrence in the filing of this document has been obtained from Jeffrey F. Keller and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party.

Date: July 6, 2009

By /s/ James R. McGuire

James R. McGuire

Attorneys for Defendant WELLS FARGO & COMPANY, WACHOVIA MORTGAGE CORPORATION, WACHOVIA BANK, N.A., WACHOVIA SECURITIES, LLC, WACHOVIA SECURITIES FINANCIAL NETWORK, LLC, WACHOVIA CORPORATION